

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

TRAVIS JAMES BROWN-BRECH

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 18 U.S.C. §§ 2252A(a)(5)(B),  
2252A(b)(2), and 2253(a)

**COUNT ONE**

**Possession of Materials Containing Child Pornography**

The Grand Jury Charges:

In or about February 2024, in the District of North Dakota, and elsewhere,

TRAVIS JAMES BROWN-BRECH

knowingly possessed and accessed with intent to view material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or minor that had not attained 12 years of age, and which had been transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, TRAVIS JAMES BROWN-BRECH knowingly possessed electronic files on a Samsung Galaxy A42 SM-A426U cellphone with IMEI: 359990820989241, which files contained one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT TWO

**Possession of Materials Containing Child Pornography**

The Grand Jury Further Charges:

In or about February 2024, in the District of North Dakota, and elsewhere,

TRAVIS JAMES BROWN-BRECH

knowingly possessed and accessed with intent to view material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or minor that had not attained 12 years of age, and which had been transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, TRAVIS JAMES BROWN-BRECH knowingly possessed electronic files on a Synchronoss with an associated with mobile number (701) 840-3825, which files contained one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT THREE

**Possession of Materials Containing Child Pornography**

The Grand Jury Further Charges:

On or about February 2024, in the District of North Dakota, and elsewhere,

TRAVIS JAMES BROWN-BRECH

knowingly possessed and accessed with intent to view material which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and which had been transported in and affecting interstate and foreign commerce by any means, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, TRAVIS JAMES BROWN-BRECH knowingly possessed electronic files in a Mega account with an username of itsmybusinessnotyours2@gmail.com, which files contained one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE NOTICE

Upon conviction of violating Title 18, United States Code, Section 2252A, as charged in this Indictment,

TRAVIS JAMES BROWN-BRECH

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violation, including, but not limited to, the following:

- Samsung Galaxy A42 SM-A426U cellphone with IMEI: 359990820989241

by virtue of the commission of one or more of the felony offenses as charged in this Indictment by defendant, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

RML/alk